

## STAFF MEMORANDUM

DATE: January 4, 2024

TO: WMA GSA Committee; CMA GSA Committee; EMA GSA Committee

FROM: GSA Agency Staff Members

SUBJECT: Recommended Further Response to SWRCB Staff Comments on the Santa Ynez GSPs' Characterization of Santa Ynez River Alluvium Above the Narrows

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### **Background:**

The Groundwater Sustainability Plans (GSPs) for the Western Management Area (WMA), Central Management Area (CMA) and Eastern Management Area (EMA) each characterize a portion of the lower Santa Ynez River and its underflow – extending from Bradbury Dam to the Lompoc Narrows – as a surface water system that exists in parallel with the groundwater system of the Basin. In accordance with the Sustainable Groundwater Management Act (SGMA), the GSPs characterize and demarcate the surface water system based on best available science and data.

State Water Resources Control Board (“State Board”) staff provided the California Department of Water Resources (“DWR”) with a comment letter, dated April 14, 2023 (“SWRCB Staff Comments”), regarding all three GSPs’ characterization of the subsurface water in River Alluvium above the Lompoc Narrows. The WMA, CMA and EMA GSAs subsequently provided DWR with a joint legal and technical response to the SWRCB Staff Comments, dated August 11, 2023.

### **Action Plan:**

DWR, State Board and the GSA representatives had two meetings to discuss said comments and response to comments. Based on said discussions, GSA agency staff members and counsel prepared the attached “Action Plan for Management of All Well Production Along the Lower Santa Ynez River, Above the Lompoc Narrows” (“Action Plan”). The Action Plan states as objectives:

“The Groundwater Sustainability Agencies (GSAs) for the WMA, CMA, and EMA are committed to ensuring that all well production in the Basin is accounted for, quantified, reported to the appropriate regulatory agency or agencies, and managed in a sustainable and responsible manner. As a corollary, the GSAs are committed to the goal of ensuring that all well production and well owners in the Santa Ynez River Alluvium Area are registered and reporting to the applicable GSA, or to the State Water Resources Control Board (State Board), and the Santa Ynez River Water Conservation District (SYRWCD).”

The Action Plan then provides for programmatic approach to achieve these objectives, which includes the GSAs’ implementation of the following actions:

- (1) Identification of existing wells located in the Above Narrows Alluvium Area, including wells registered with SYRWCD and identified in statements of water diversion and use filed with the State Board;
- (2) Arranging at least 2 educational workshops per year during the next 2 years to educate all well owners and producers in the Above Narrows Alluvium Area with the goal of ensuring that all such diversions are properly reported to the applicable GSA or to the State Board, and SYRWCD, as applicable;
- (3) Conducting of further analysis of Airborne Electromagnetic (AEM) surveys and interconnected surface and groundwater systems; and
- (4) Inclusion of relevant information obtained in future GSP Annual Reports and Periodic Evaluations.

DWR has encouraged the GSAs to post the Action Plan to the DWR SGMA Portal (“Portal”) as a further response to comments that DWR can reference in its plan review.

**Recommendation:**

Staff recommends that each of the GSA Committees approve and authorize the SGMA Point of Contact or his designee to transmit to DWR and post to the Portal the enclosed Transmittal Letter and Action Plan, in substantially the form presented, as a further response to SWRCB Staff Comments on behalf of the WMA, CMA and EMA GSAs.